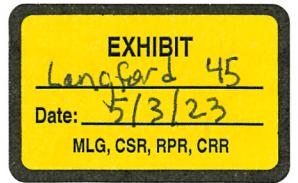
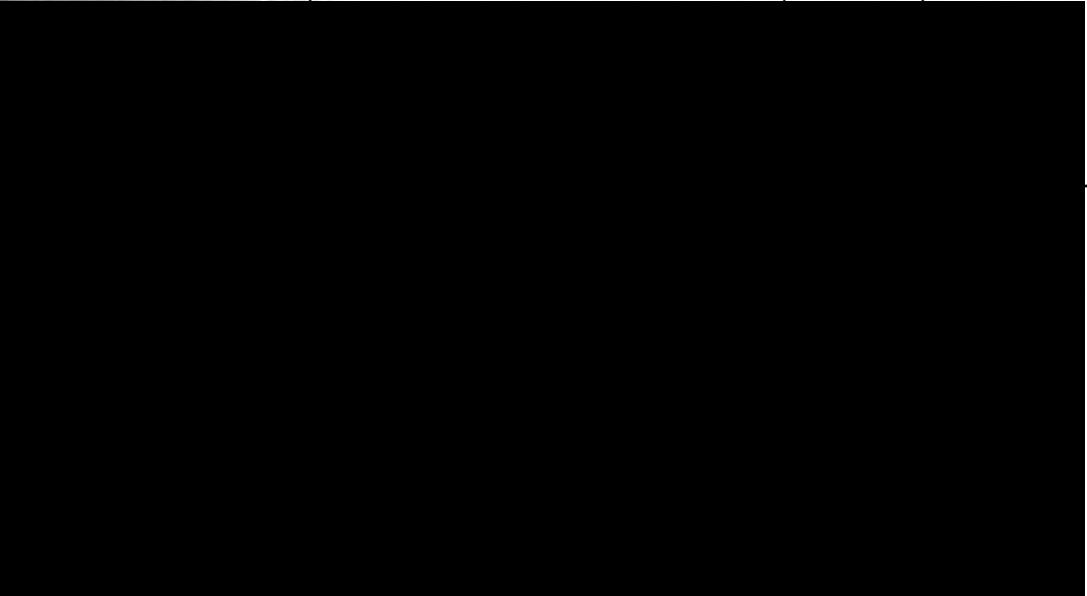


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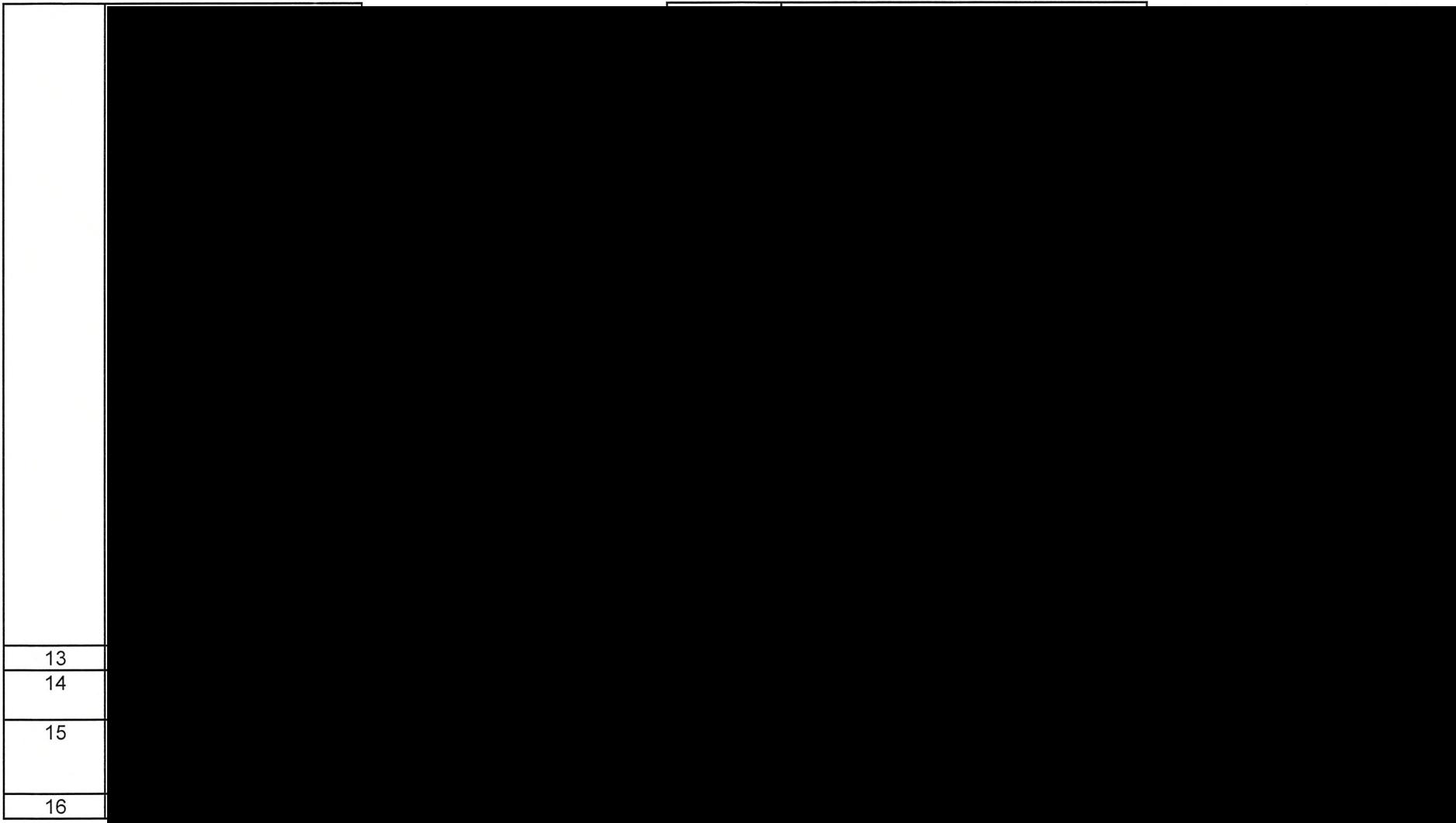
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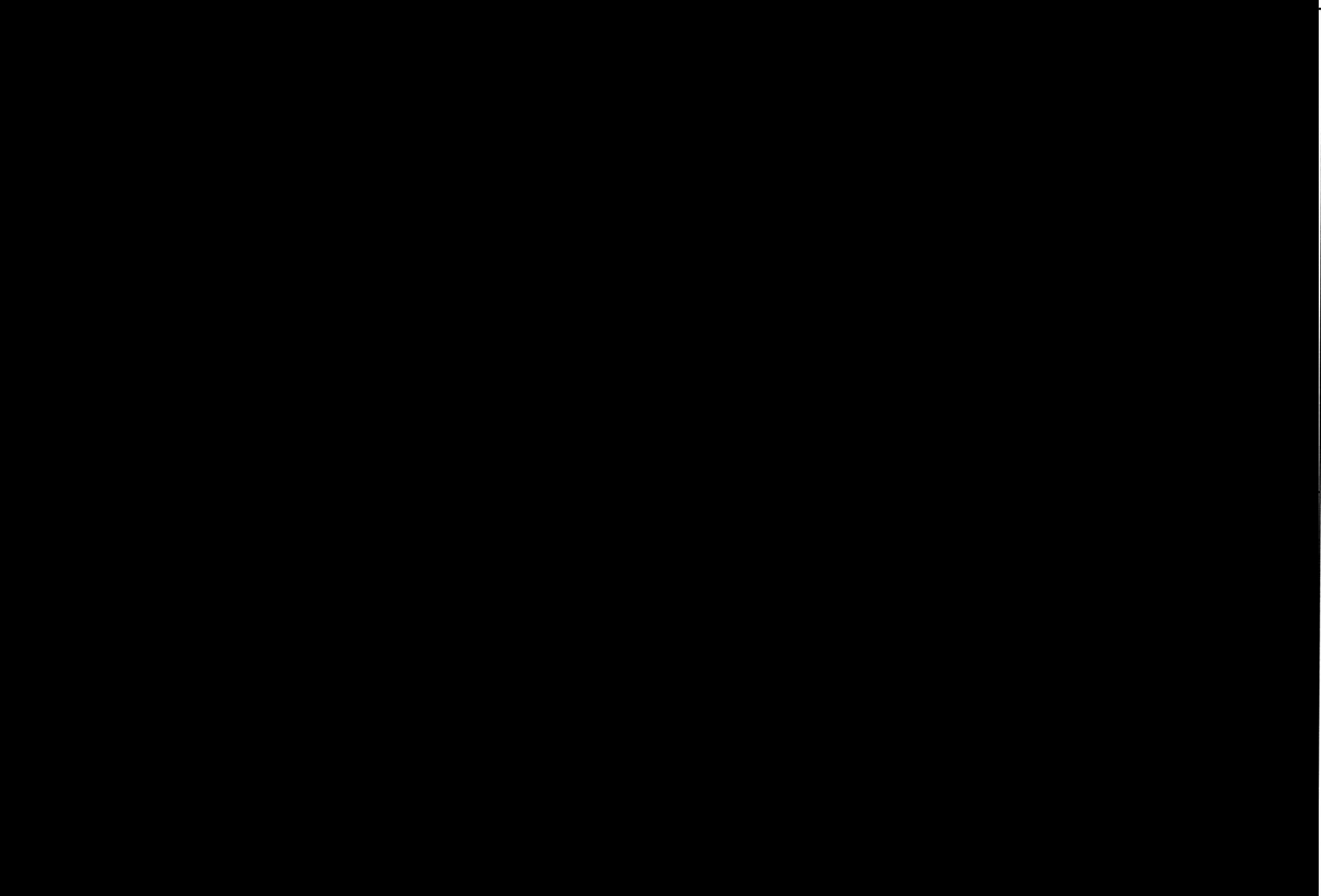
Item #	Client	Reason	Date	Outcome	Additional Comments
1	[REDACTED]	[REDACTED]			
2	Jeffrey Epstein	Several newspaper articles were found that detail the indictment of Jeffrey Epstein in Florida on felony charges of soliciting underage prostitutes.	10/17/2006	Retain	After internal discussions with Jes Staley, Mary Erdoes, Catherine Keating, John Duffy and Mary Casey, it was decided that we will keep Mr. Epstein solely as a banking client and on a 'reactive', client service basis. We will not proactively solicit new investment business from him
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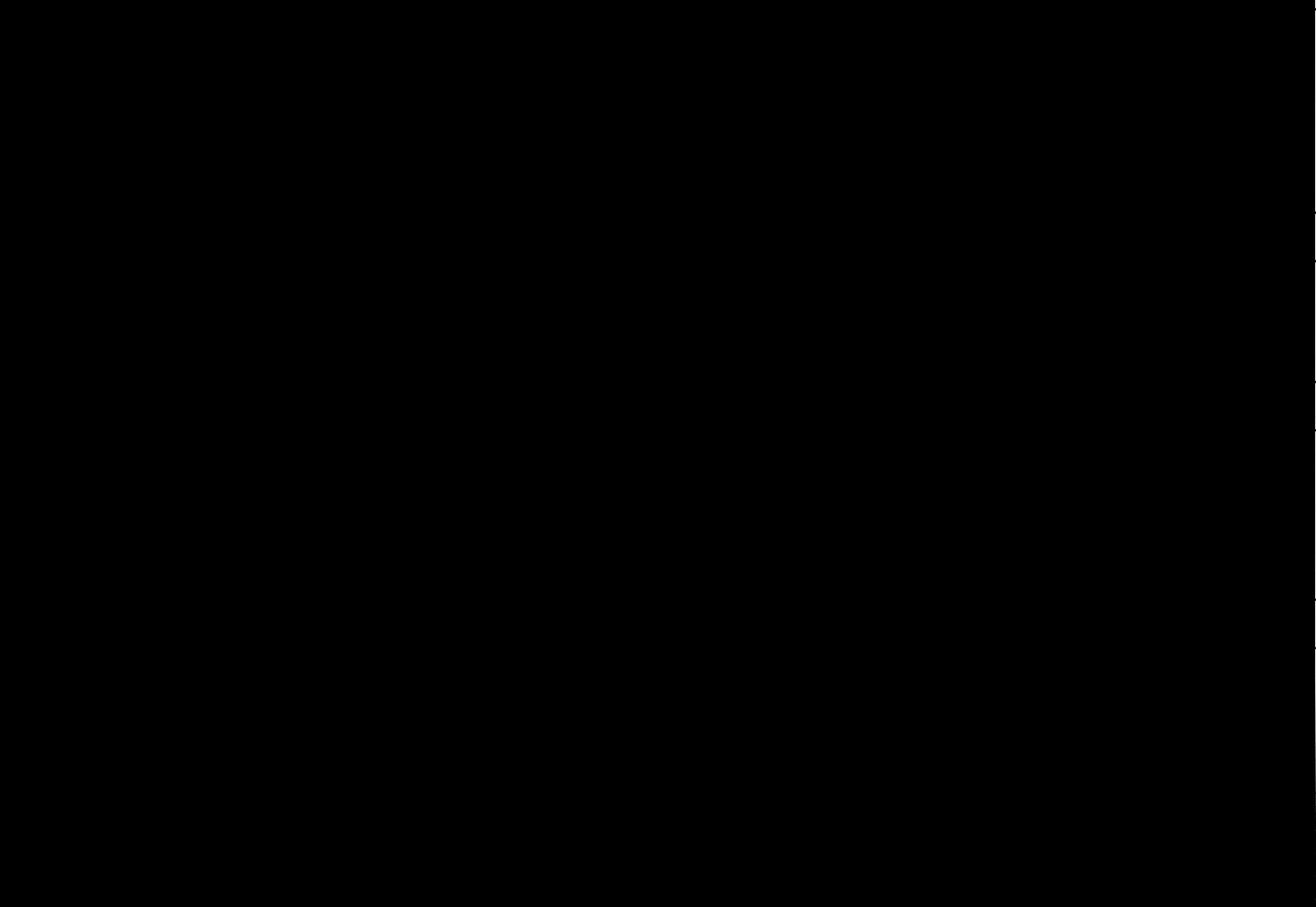
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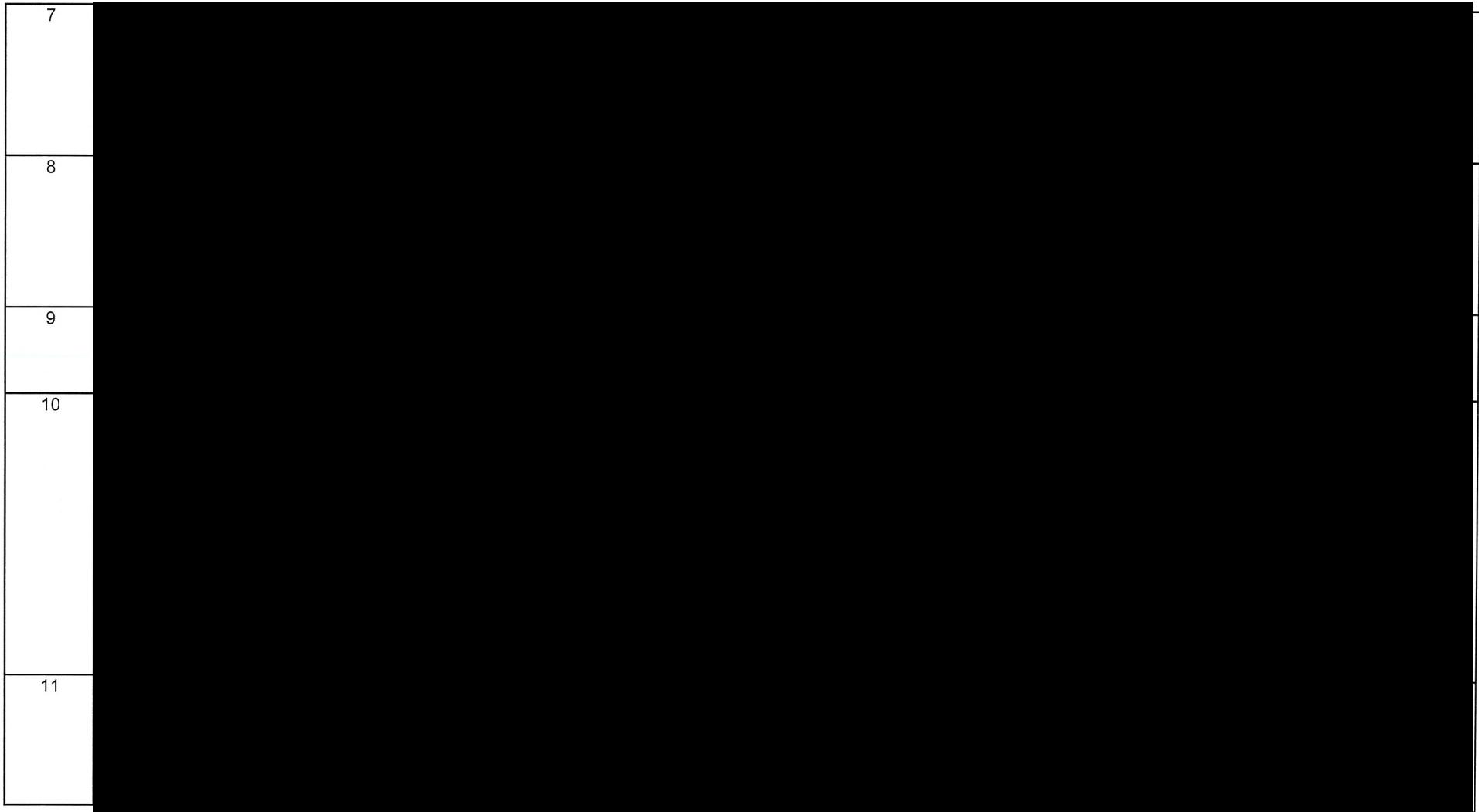
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21	Jeffrey Epstein	Follow up meeting after news that Epstein was sentenced to 12 months in jail for solicitation of a prostitute and six months for procuring a person under the age of 18 for prostitution followed by 12 months of house arrest.	7/15/2008	Catherine will go back to JES to tell him we are uncomfortable with Epstein and do not want to go to Cutler for approval.	
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Item #	Client/Prospect	Reason	Date	Outcome	Additional Comments	Follow up Y/N	Follow up Complete Y/N	F/U Action, due date
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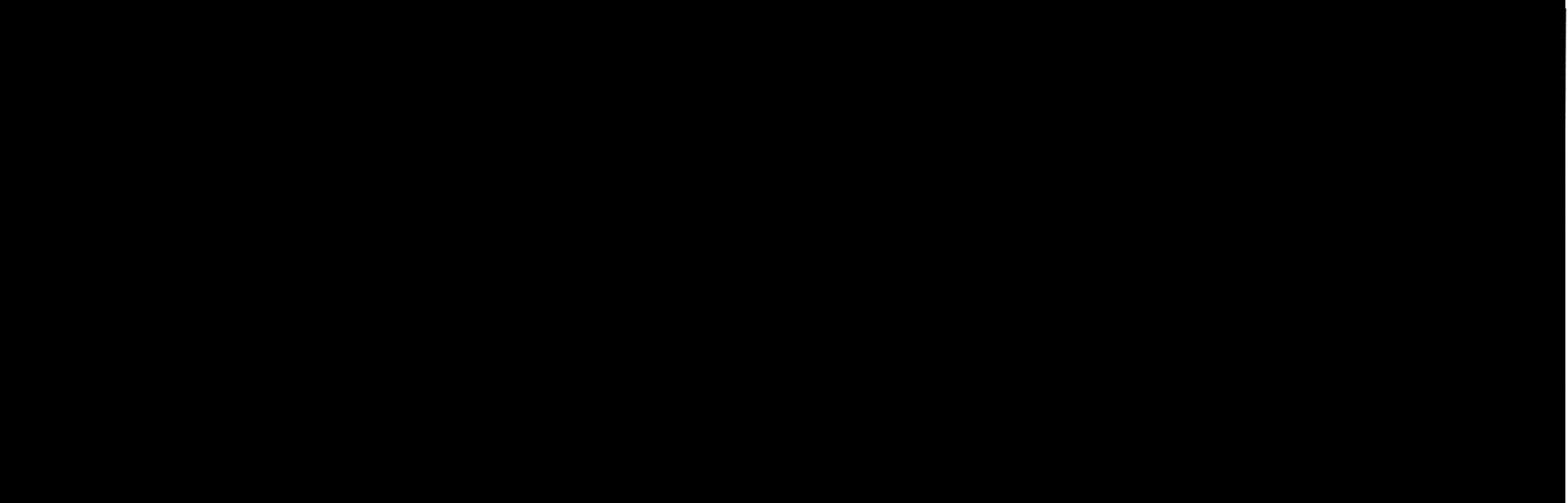
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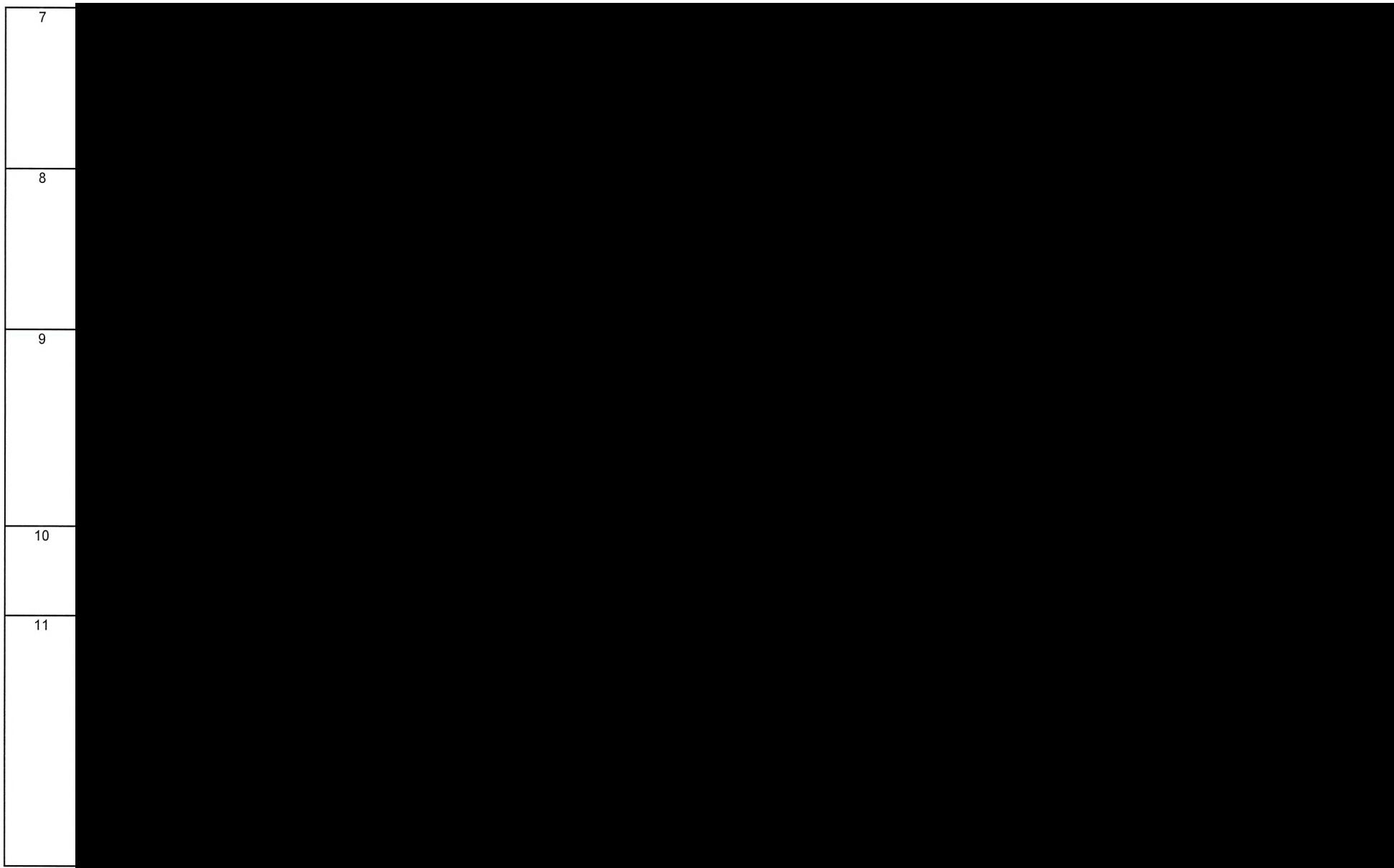
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Item #	Client/Prospect	Client/Prospect Category	Reason	Date	Outcome	Additional Comments	Follow up Y/N	Follow up Complete Y/N	F/U Action, due date
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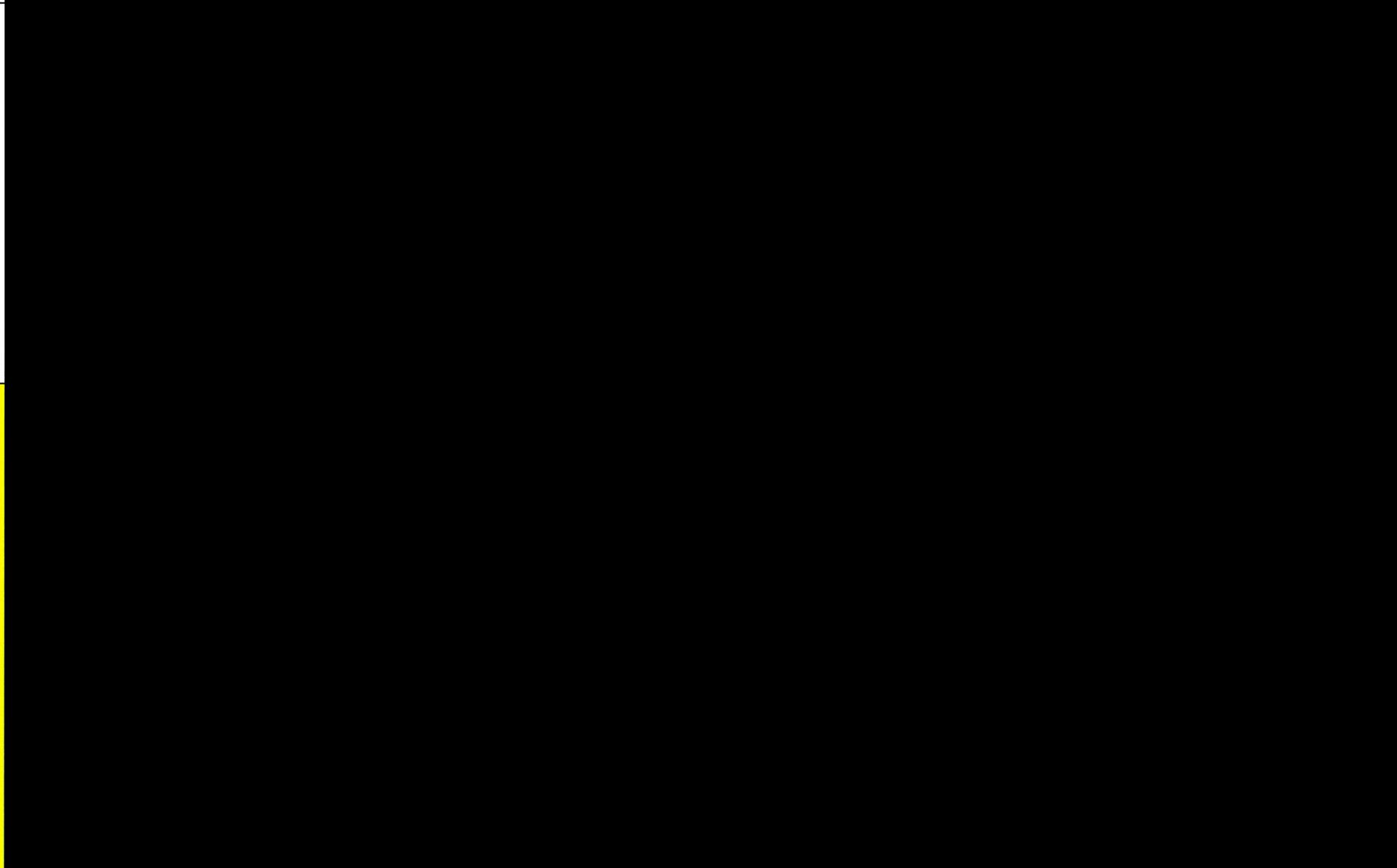
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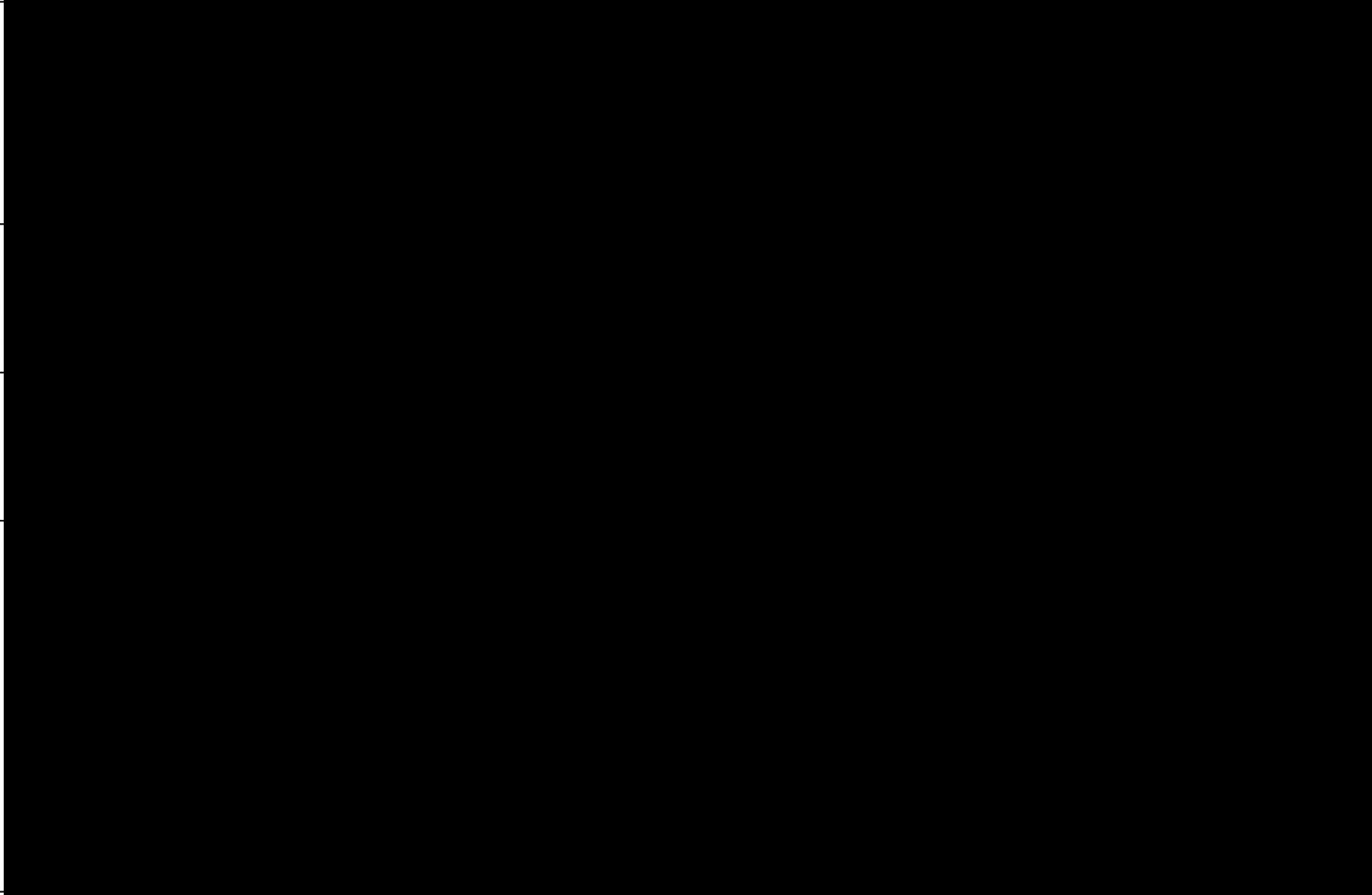
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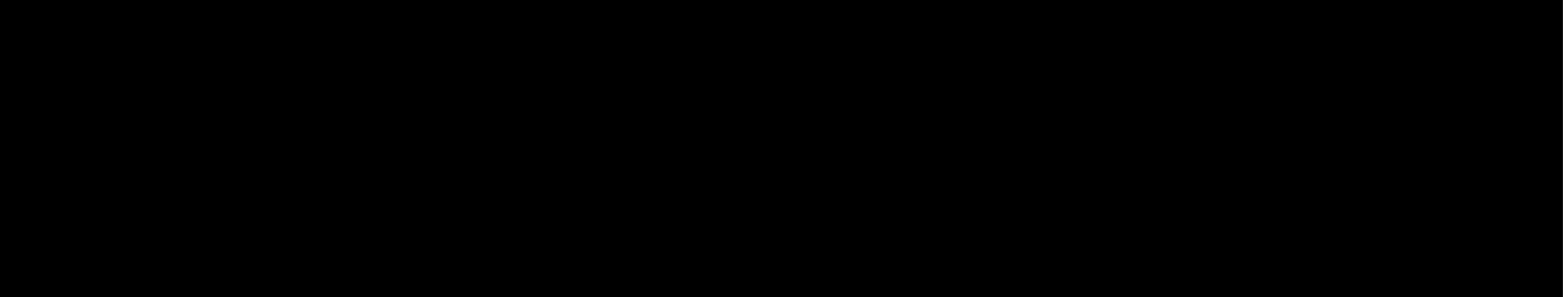
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Item #	Client/Prospect	Client/Prospect Category	Reason	Date	Outcome	Additional Comments	Follow up Y/N	Follow up Complete Y/N	F/U Action, due date
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2	Jeffrey Epstein	Existing Client	The Firm's AML Director (William Langford) has expressed concern over the possibility that Mr. Epstein is under investigation for human trafficking.	1/7/2011	Discussions to be held with William and Nina to determine how to approach the issue with Jes Staley, who is friends with Epstein. He needs to understand the potential backlash to the firm given all of the work done to root out clients involved in human trafficking.	AML Ops has conducted extensive research to root out clients involved in human trafficking. William Langford is requiring that if the business decides to proceed, then re-approval by Steve Cutler will be required.	Y		1/28/11 - Follow up to see if meeting with Jes has taken place and the LOB's decision for re-approval. 3/15/2011: Paul Morris spoke with JE. The SBLC will not be renewed.
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22	Jeffrey Epstein	Existing Client - 4th follow-up		Review with John Duffy.	8/4/2011	Duffy to reach out to Jes Staley and advise that we exit while things are a bit settled.			
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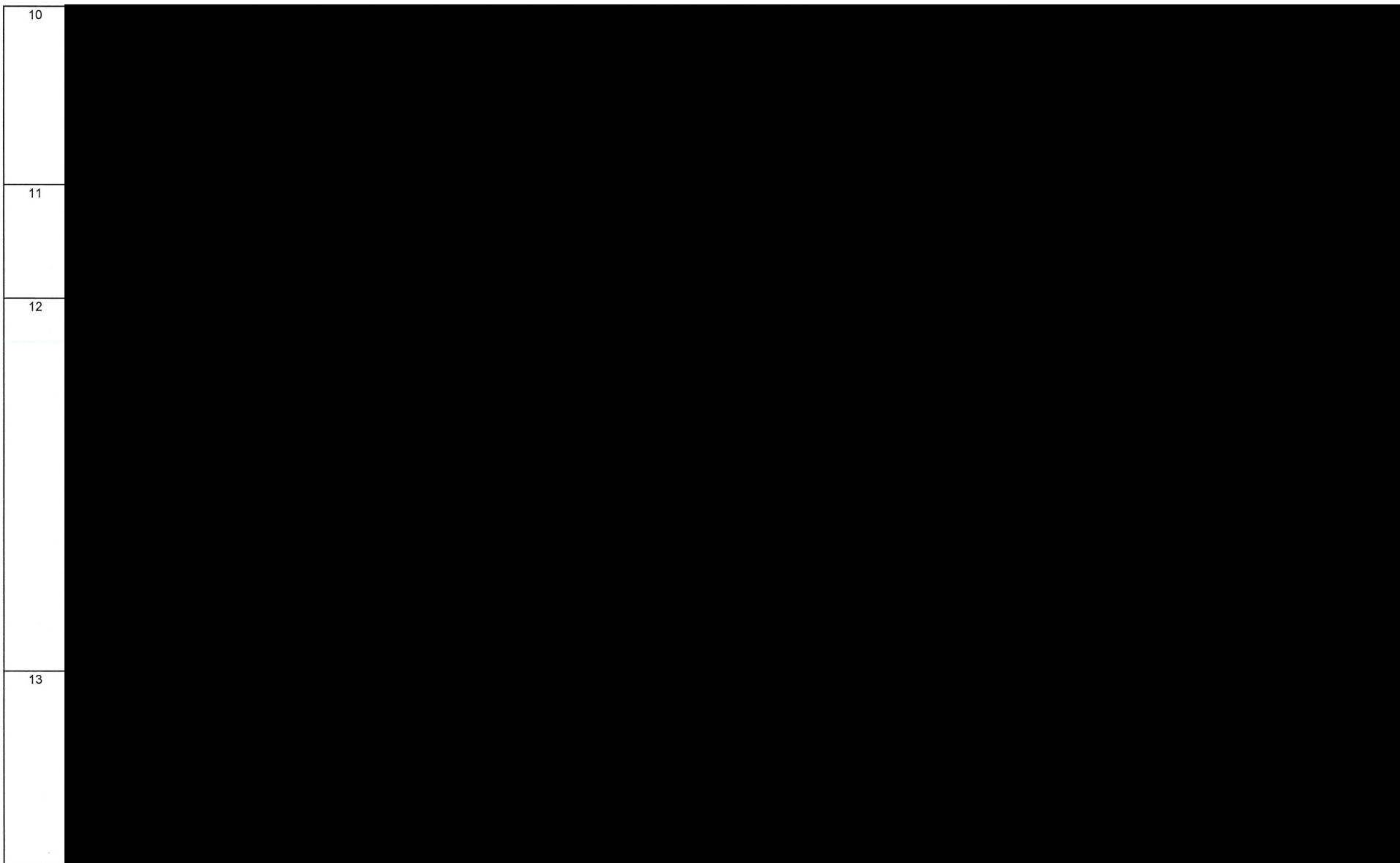
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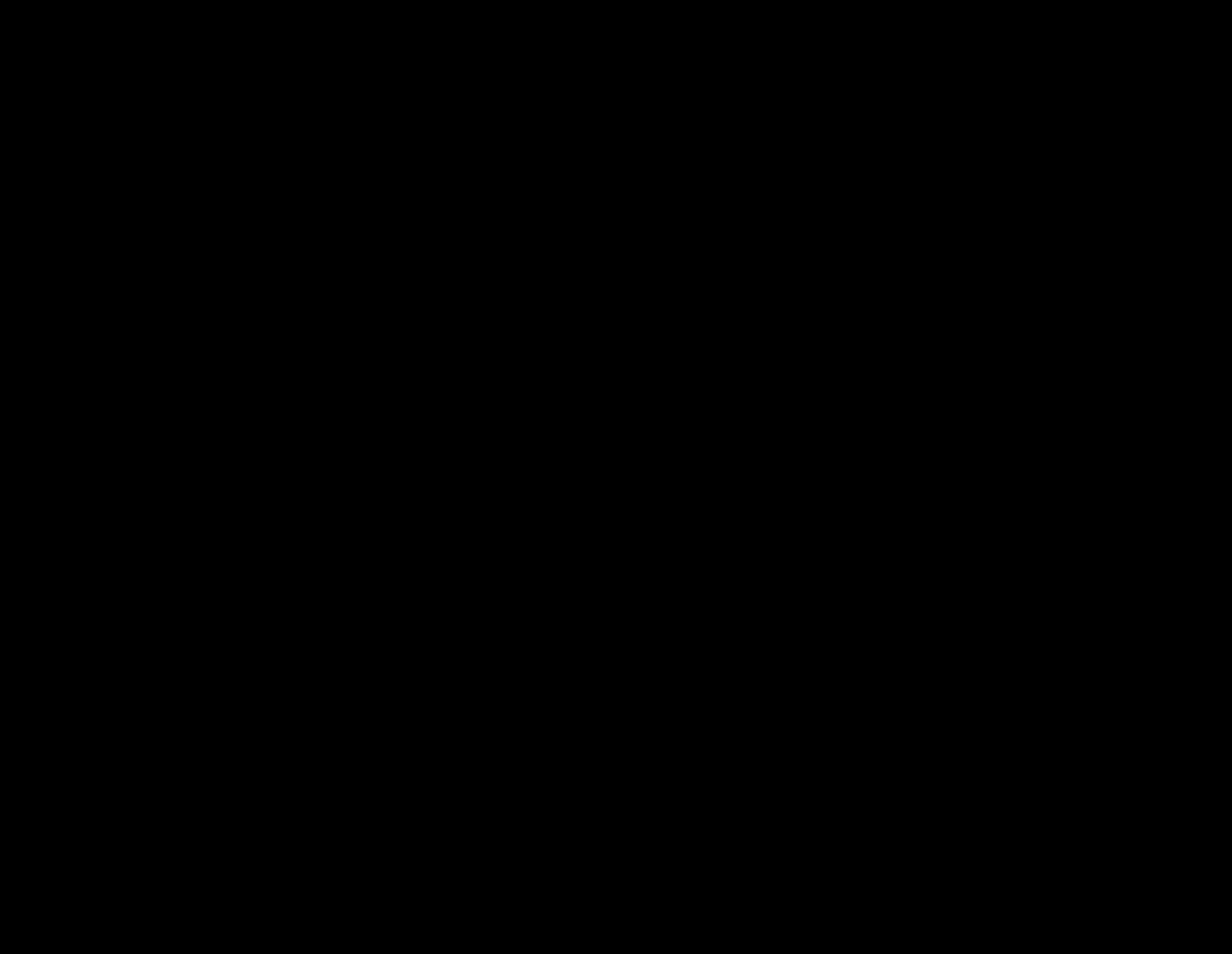
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Item #	Client/Prospect	Client/Prospect Category	ECI	Reason	Date	Outcome	Additional Comments	Follow up Y/N	Follow up Complete Y/N	F/U Action, due date	Reputational Risk Ctte. Minutes Written
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